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**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS - EASTERN DIVISION**

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HANNAH RAQUEL NUSZEN,

Plaintiff,

v.

JACK NUSZEN; SHANNON ORAND  
NUSZEN; NORMA WILLCOCKSON  
a/k/a WILLCOXSON; MELVIN  
WILLCOCKSON a/k/a  
WILLCOXSON; DR. KAREN  
GOLLAHER; SAGE EDUCATIONAL  
GROUP; ASPEN INSTITUTE FOR  
BEHAVIORAL ASSESSMENT; DR.  
JEFFREY J. WILSON; DR. JOSHUA J.  
CLUFF; DR. BRANDON S. PARK;  
NEW HAVEN RESIDENTIAL  
TREATMENT CENTER; DAYNA  
BUXTON; JESSICA ENDRES; DAVE  
ARCHER; JOHN and JANE DOES 1-  
100,

Defendant(s).

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**CASE NO. 1:17-cv-05750**

FILED

NOV 20 2017

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

**PLAINTIFF'S MOTION TO REINSTATE  
AND ADD DEFENDANT**

Plaintiff HANNAH RAQUEL NUSZEN hereby submits a Motion to Reinstate in accordance with Rule 4(m) of the Federal Rules of Civil Procedure and to Add Defendant in accordance with Rule 19 of the Federal Rules of Civil Procedure in this matter.

**I. The Plaintiff Did Not Delay Process.**

Fed.R.Civ.P. 4(m) states, "Unless the court orders otherwise, any required response to an amended pleading must be made within the time remaining to respond to the original pleading or within 14 days after service of the amended pleading, whichever is later."

This is a case where the Defendants JACK NUSZEN and SHANNON ORAND NUSZEN are guilty of child abduction under Tex. Penal Code S 25.03 (Interference of Custody) having paid Defendants NORMA WILLCOCKSON a/k/a WILLCOXSON and MELVIN WILLCOCKSON a/k/a WILLCOXSON to have me forcibly taken from school and transported across state lines, against my free will, and intentionally concealing my whereabouts over a long, extended period of time. The Defendants NORMA WILLCOCKSON a/k/a WILLCOXSON and MELVIN WILLCOCKSON a/k/a WILLCOXSON are guilty of child abduction under the Tex. Penal Code S 25.031 (a) (Agreement to Abduct From Custody).

These are serious and egregious offenses and the Defendants should not be permitted to profit and enjoy unjust enrichment from crimes that were perpetrated on me and the Court.

There has been problems getting some of the Defendants served as Hurricane Harvey caused people to be displaced and there has been an issue with locating them to provide proper service.

## **.II. Amended Complaint is Warranted.**

Fed.R.Civ.P. 19 states that “a party is necessary to a lawsuit when one of two conditions arise: (1) the party must be present in order to award ‘complete relief’, or (2) the party has an interest in the action so that his or her interest cannot be represented and protected without that party appearing in the lawsuit. This also applies when the party's absence may expose other parties to double or inconsistent outcomes. gives the Court the authority to strike the responsive pleading if the response is not filed within the time required.”

Fed. R. Civ. P. 15(a) provides that leave to amend should “be freely given when justice so requires.”

The Complaint was filed and included Aspen Institute for Behavioral, however, it has since been learned that the facility has modified its name and it now calling itself Viewpoint Center. The fictitious names of John and Jane Does 1-100 were included as Defendants for just such a

circumstance. Therefore, I respectfully request that the Viewpoint Center be added as a Defendant and to the caption heading in this matter.

**III. Conclusion.**

In short, Plaintiff did not willfully delay any part of the process. The natural disaster of Hurricane Harvey impeded the process server as did the Defendants who were notified about the Complaint who have willfully and purposefully avoided service. Further, an amended Complaint is justified in this matter as it was discovered that one of the Defendants modified their identity and the names of John and Jane Does 1-100 were included to ensure that the Plaintiff could add unidentified defendants at a future date.

Respectfully submitted,

Dated: November 8, 2017

/s/ Hannah Raquel Nuszen  
HANNAH RAQUEL NUSZEN  
5707 N. CHRISTIANA AVENUE  
CHICAGO, ILLINOIS 60659  
713-240-5059  
Miriamb12969@gmail.com  
PLAINTIFF, Pro se

CERTIFICATION OF SERVICE

I hereby certify that copies of this document for served upon the Parties at the addresses listed below via USPS certified mail, return receipt requested and email.

Norma Willcockson and Melvin Willcockson  
Guardians of Hope  
1915 North Frazier #104  
Conroe, Texas 77301

Jack Nuszen and Shannon Orand Nuszen  
c/o Golda R. Jacob, Esq.  
440 Louisiana St #1500  
Houston, TX 77002

Golda R. Jacob, Esq. and Golda R. Jacob and Associates  
440 Louisiana St #1500  
Houston, TX 77002

Dr. Karen Gollaher  
9100 Southwest Fwy # 152  
Houston, TX 77074

Sage Educational Group  
3730 Kirby Dr #520  
Houston, TX 77098

Viewpoint Center  
2732 W 2700 S  
Syracuse, UT 84075

Aspen Institute For Behavioral Assessment  
2732 W 2700 S  
Syracuse, UT 84075

Dr. Jeffrey Wilson  
2732 W 2700 S  
Syracuse, UT 84075

New Haven Residential Treatment Center  
2172 East 7200 South  
Spanish Fork, UT 84660

Dr. Bill Bunn  
2172 East 7200 South  
Spanish Fork, UT 84660

Dr. Lynda Baum  
2172 East 7200 South  
Spanish Fork, UT 84660

Dated: November 8, 2017

/s/ Hannah Raquel Nuszen  
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